

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- x
SARAH CHANG, :
Plaintiff, : Index No. _____
: SUMMONS WITH NOTICE
- against - :
MICHAEL CHANG, : Plaintiff designates New York
Defendant. : County as the place for trial
The basis for venue is pursuant to
CPLR § 503
----- x

To The Above-Named Defendant:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED and required to submit to Plaintiff's attorney your answering papers on this motion within the time provided in the notice of motion annexed hereto.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the notice of motion.

Dated: June 9, 2025
New York, New York

BAKER BOTTS L.L.P.



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Sarah Reeves
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New York, NY 10112
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Counsel for Plaintiff Sarah Chang

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

SARAH CHANG, : Index No. _____
Plaintiff, :
- against - :
MICHAEL CHANG, :
Defendant. :
----- X

**PLAINTIFF'S NOTICE OF MOTION FOR SUMMARY JUDGMENT
IN LIEU OF COMPLAINT**

PLEASE TAKE NOTICE that upon the summons dated June 9, 2025, the annexed affirmation of Sarah Chang, sworn to June 5, 2025, and the exhibits attached thereto, and the accompanying memorandum of law, the undersigned, as attorneys for Plaintiff Sarah Chang, will move the Court located at 60 Centre Street, Submission Part, Room 130, New York, NY 10007 on the 9th day of July 2025 at 9:00 am, or as soon thereafter as counsel may be heard, for an order granting Plaintiff's motion for summary judgment in lieu of a complaint pursuant to CPLR § 3213.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR § 2214(b), answering papers, if any, shall be served upon the undersigned on or before July 2, 2025, and reply papers shall be served on or before July 8, 2025.

Dated: June 9, 2025
New York, New York

BAKER BOTTS L.L.P.



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Counsel for Plaintiff Sarah Chang

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- x
SARAH CHANG, :
Plaintiff, : Index No. _____
: .
- against - :
MICHAEL CHANG, :
: .
Defendant. :
: .
----- x

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT IN LIEU OF A COMPLAINT**

BAKER BOTTS L.L.P.

Andrew Lankler
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Attorneys for Plaintiff Sarah Chang

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Plaintiff Sarah Chang (“Plaintiff” or “Ms. Chang”) submits this brief in support of her motion to for summary judgment in lieu of a complaint.

PRELIMINARY STATEMENT

Through this motion, Ms. Chang seeks to enforce the terms of and collect funds due to her under a promissory note, executed by Defendant Michael Chang (the “Defendant”) on May 27, 2022 (the “Note”), attached hereto as Exhibit A to the Affirmation of Sarah Chang (“Chang Aff.”). Under the terms of the Note, Defendant agreed to pay Ms. Chang \$1,464,584.04, together with interest of 2.63%, for educational expenses she advanced for him. Defendant made the first monthly payment of \$6,666.67 in January 2023 as required under the Note and continued to make payments without incident through November 2024. However, Defendant has failed to make payments since November 2024. As such, Ms. Chang brings this action to recover the six monthly payments due and payable under the terms of the Note, currently totaling approximately \$40,000.02, and continuing to accrue each month Defendant refuses to pay.

Ms. Chang brings this motion for summary judgment pursuant to CPLR § 3213, which allows a plaintiff to recover under the terms of an instrument “for the payment of money only,” by bringing a motion for summary judgment in lieu of a complaint. As demonstrated herein, Defendant has defaulted on the Note, which contains an unequivocal promise to pay, and Ms. Chang is entitled to summary judgment as a matter of law.

PARTIES, JURISDICTION AND VENUE

Plaintiff Sarah Chang is an individual who resides in Villanova, Pennsylvania. Defendant Michael Chang is an individual who resides in New York, New York. Jurisdiction and venue in this Court are proper pursuant to CPLR § 301 and § 503(a), as it is the county of Defendant’s residence.

STATEMENT OF FACTS

Defendant and Ms. Chang are brother and sister. Chang Aff. ¶ 2. Over the years, Ms. Chang has supported Defendant and other members of their family with earnings she made during childhood and young adulthood. Specifically, Ms. Chang covered the costs of certain education expenses incurred by Defendant, including, among other things, tuition for middle school, high school and five years at university. *Id.* at ¶ 3. At the time the expenses were paid, both Ms. Chang and Defendant understood the money to be a loan, which Defendant would need to pay back in the future. *Id.* at ¶ 4.

On May 27, 2022, Defendant executed the Note agreeing to pay Ms. Chang back for his educational expenses over the course of the next 25 years. *See* Chang Aff., Ex. A. The Note obligated Defendant to pay the principal amount of \$1,464,584.04 (USD), together with interest of 2.63%, in 300 consecutive monthly installments of \$6,666.67 (USD) each, beginning in January 2023 and ending December 2047, or through an aggregate payment of \$2,000,000 (USD), which includes both principal and the agreed interest. *Id.* Defendant accepted the terms of the Note and made the first payment as required in January 2023. Chang. Aff. ¶ 7. He continued making regular payments to Ms. Chang from January 2023 until November 2024, totaling 23 payments or approximately \$153,333.41. *Id.* at ¶¶ 7-8. Defendant has not made any payments since November 2024. *Id.* at ¶ 9.

Under the terms of the Note, Defendant is presently overdue at least six payments to Ms. Chang, totaling approximately \$40,000.02.¹

¹ As of the filing of this motion, Defendant is overdue six payments of \$6,666.67 each for the months of December 2024 and January-May 2025, totaling \$40,000.02. However, with each passing month that Defendant fails to pay under the Note during this litigation, Ms. Chang continues to incur damages of \$6,666.67 per month.

ARGUMENT

Pursuant to CPLR § 3213, “when an action is based upon an instrument for the payment of money only,” then “the plaintiff may serve with the summons a notice of motion for summary judgment and supporting papers in lieu of a complaint.” To establish a prima facie case that qualifies for this expedited procedure, plaintiff must establish that defendant executed an instrument for the payment of money only, and then failed to make the payments called for by its terms. *Maglich v. Saxe, Bacon & Bolan, P.C.*, 97 A.D.2d 19, 21 (1st Dept. 1983); *see Generale Bank, N.Y. Branch v. Nagaraj*, 193 A.D.2d 376, 376 (1st Dept. 1993) (holding that “Plaintiff established a prima facie case by setting forth proof of the note and defendant’s failure to make payment thereon.”). Although an “instrument for the payment of money only,” can take many forms, so long as it creates an “unambiguous and unconditional obligation to pay a specified sum,” it qualifies for the accelerated procedure under CPLR § 3213. *HCG Mezzanine Dev. Fund, L.P. v. Jreck Holdings, LLC*, No. 652797/2011, 2012 WL 5438910, at *3 (Sup. Ct. N.Y. Cty. Oct. 26, 2012).

Once plaintiff has met its burden, unless defendant can establish, with admissible evidence, that a triable issue of fact exists, then summary judgment is appropriate. *See SCP (Bermuda) Inc. v. Bermudatel Ltd.*, 224 A.D.2d 214, 216 (1st Dept. 1996); *Seaman-Andwall Corp. v. Wright Mach. Corp.*, 31 A.D.2d 136, 137 (1st Dept. 1968).

There is no question that Ms. Chang is entitled to recover here. Defendant executed a simple promissory note that contained an unequivocal and unconditional obligation to repay Ms. Chang in monthly installments. See Chang Aff., Ex. A. Defendant accepted the terms of the Note and performed thereunder for nearly 2 years, paying Ms. Chang regularly on the following dates:

Date	Amount
1/30/23	\$6,666.67
2/28/23	\$6,666.67
3/30/23	\$6,666.67
4/28/23	\$6,666.67
5/30/23	\$6,666.67
6/29/23	\$6,666.67
8/1/23	\$6,666.67
8/30/23	\$6,666.67
9/28/23	\$6,666.67
10/30/23	\$6,666.67
11/30/23	\$6,666.67
12/29/23	\$6,666.67
1/31/24	\$6,666.67
2/29/24	\$6,666.67
3/28/24	\$6,666.67
4/30/24	\$6,666.67
5/31/24	\$6,666.67
6/28/24	\$6,666.67
7/31/24	\$6,666.67
8/30/24	\$6,666.67
9/30/24	\$6,666.67
10/31/24	\$6,666.67
11/29/24	\$6,666.67

See Chang Aff., Ex. B. Defendant has not paid Ms. Chang since November 2024, see Chang Aff. ¶ 9, leaving six payments overdue and fully payable to Ms. Chang. Ms. Chang has established a prima facie claim for breach of the Note, and is entitled to judgment as a matter of law.

CONCLUSION

For the foregoing reasons, Ms. Chang is entitled to summary judgment over and against the Defendant for \$40,000.02, and accruing each month that Defendant continues to decline payment, together with all costs and legal fees to be set by the Court, and any and all other further relief in favor of Plaintiff this Court deems just and proper.

Dated: June 9, 2025
New York, New York

Respectfully submitted,
BAKER BOTTS L.L.P.



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Counsel for Plaintiff Sarah Chang

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
SARAH CHANG, : Index No. ____ /2025
Plaintiff, :
- against - :
MICHAEL CHANG, :
Defendant. :
----- X

**AFFIRMATION OF SARAH CHANG IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT IN LIEU OF COMPLAINT**

I, SARAH CHANG, pursuant to CPLR § 2106 and under the penalties of perjury, affirm as follows:

1. I am the plaintiff in the above-captioned matter and submit this Affirmation in Support of the Motion for Summary Judgment in Lieu of a Complaint. I am fully familiar with the facts herein and if called as a witness in this action, I could and would testify competently to these facts.

2. Defendant Michael Chang ("Defendant") is a resident of New York, New York. He and I are brother and sister.

3. Over the years, I have provided financial support to Defendant with earnings made during childhood and young adulthood. Specifically, I covered the cost of education expenses incurred by Defendant, which included tuition for middle school, high school and five years at university.

4. At the time I paid for these educational expenses, Defendant understood the money to be a loan which he would need to pay back in the future.

5. On May 27, 2022, Defendant executed a promissory note (the "Note"), a true and correct copy of which is attached hereto as **Exhibit A**, agreeing to repay me for the education and other expenses advanced to him.

6. Pursuant to the Note, Defendant agreed to pay the principal amount of \$1,464,584.04 (USD), together with interest of 2.63%, in 300 consecutive monthly installments of \$6,666.67 (USD) each, beginning in January 2023 and ending December 2047, or through an aggregate payment of \$2,000,000 (USD), which includes both principal and the agreed interest.

7. Defendant made the first payment of \$6,666.67 on January 30, 2023. He made 22 additional payments from February 2023 to November 2024.

8. Attached hereto as **Exhibit B** are true and correct copies of my bank statements showing Defendant's monthly payments of \$6,666.67 to me from January 2023 through November 2024.

9. Defendant's last payment under the Note was in November 2024. He has failed to make any additional payments pursuant to the Note since then.

I affirm this 5th day of June, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



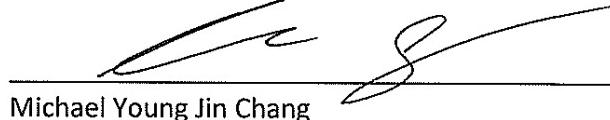
Sarah Chang

EXHIBIT A

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

Repayment Promise

I, Michael Young Jin Chang, hereby promise to pay to my sister, Sarah Young Joo Chang, the principal amount of one million, four hundred sixty four thousand, five hundred eighty four dollars and four cents (\$1,464,584.04) (USD), together with interest at two and sixty three hundredths percent (2.63%), in reimbursement for educational costs that she advanced for me. I shall repay the amount referenced above over a period of twenty-five years (or sooner) in 300 consecutive monthly installments of \$6,666.67 (USD) each, commencing January 2023 and ending December 2047, or an aggregate payment of \$2,000,000 (USD) including both principal and the agreed interest.



Michael Young Jin Chang

Dated May 27, 2022

N:\Documents\6245\002\Promise-HH.rtf

EXHIBIT B

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

Performance Select Statement

RECEIVED NYSCEF: 06/09/2025

For 24-hour information, sign on to PNC Bank Online Banking on pnc.com.

Account number: [REDACTED] 5472 - continued

For the period 01/25/2023 to 02/21/2023

SARAH Y CHANG

Primary account number: [REDACTED] 5472

Page 2 of 2

Activity Detail**Deposits and Other Additions**

Date	Amount	Description
01/30	6,666.67	Book Trn Credit 231Ue5718Cgj4V65

There were 3 Deposits and Other Additions totaling [REDACTED]

Checks and Substitute Checks

Check number	Amount	Date paid	Reference number	Check number	Amount	Date paid	Reference number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

* Gap in check sequence

There were 7 checks listed totaling [REDACTED]

Online and Electronic Banking Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 5 Online or Electronic Banking Deductions totaling [REDACTED]

Other Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 2 Other Deductions totaling [REDACTED]

Daily Balance Detail

Open balance	Deposited	Withdrew	Balance
\$ 6,666.67	\$ 0.00	\$ 0.00	\$ 6,666.67
\$ 6,666.67	\$ 0.00	\$ 0.00	\$ 6,666.67

Virtual Wallet With Performance Select Statement

RECEIVED NYSCEF: 06/09/2025

For 24-hour information, sign on to PNC Bank Online Banking
on pnc.com.

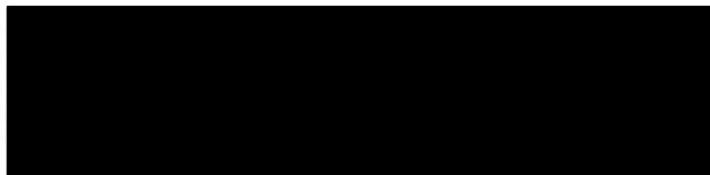
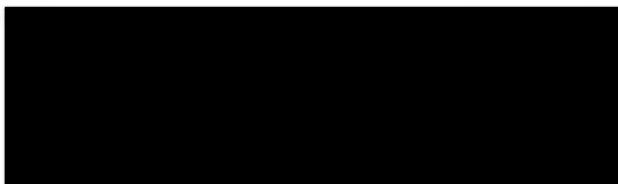
Account number: [REDACTED] 8769 - continued

For the period 02/15/2023 to 03/16/2023

SARAH Y CHANG

Primary account number: [REDACTED] 8769

Page 2 of 3

Balance Summary**Transaction Summary****Interest Summary**

Annual Percentage Yield Earned (APYE)	Number of days in interest period	Average collected balance for APYE	Interest Earned this period
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

As of 03/16, a total of [REDACTED] in interest was paid this year.

Activity Detail**Deposits and Other Additions**

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 8 Deposits and Other Additions totaling [REDACTED].

02/28 6,666.67 Deposit Reference No. 020314158
Effective 02-27-23

Checks and Substitute Checks

Check number	Amount	Date paid	Reference number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

There is 1 check listed totaling [REDACTED].

There were 5 Online or Electronic Banking Deductions totaling [REDACTED].

Online and Electronic Banking Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

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INDEX NO. UNASSIGNED

RECEIVED NYSCEF: 06/09/2025

Virtual Wallet With Performance Select Statement

For 24-hour information, sign on to PNC Bank Online Banking
on pnc.com.

Account number: [REDACTED] 8769 - continued

For the period 03/17/2023 to 04/17/2023

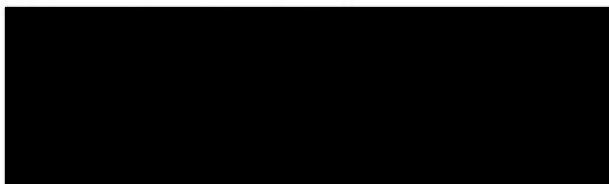
SARAH Y CHANG

Primary account number: [REDACTED] 8769

Page 2 of 3

Balance Summary

Beginning balance	Deposits and other additions	Checks and other deductions	Ending balance
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Transaction Summary**Interest Summary**

Annual Percentage Yield Earned (APYE)	Number of days in interest period	Average collected balance for APYE	Interest Earned this period
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

As of 04/17, a total of [REDACTED] in interest was paid this year.

Activity Detail**Deposits and Other Additions**

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 6 Deposits and Other Additions totaling [REDACTED].

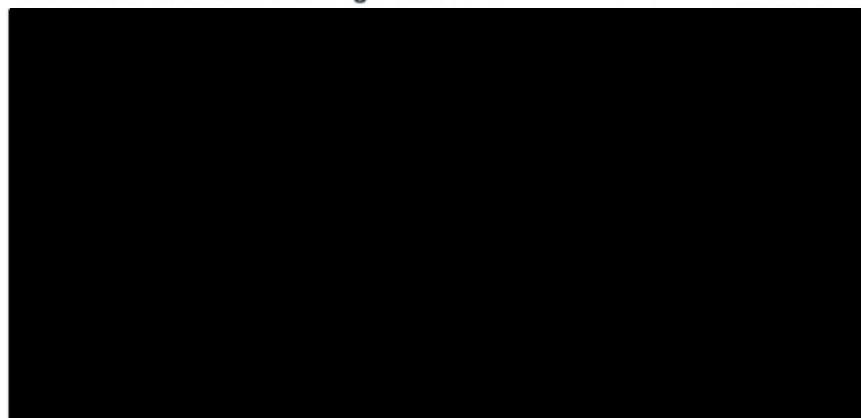
03/30 6,666.67 Deposit Reference No. 048972363

Checks and Substitute Checks

Check number	Amount	Date paid	Reference number	Check number	Amount	Date paid	Reference number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

* Gap in check sequence

There were 2 checks listed totaling [REDACTED].

Online and Electronic Banking Deductions

There were 10 Online or Electronic Banking Deductions totaling [REDACTED].

Virtual Wallet With Performance Select Statement

RECEIVED NYSCEF: 06/09/2025

For 24-hour information, sign on to PNC Bank Online Banking
on pnc.com.

For the period 04/18/2023 to 05/16/2023

SARAH Y CHANG
Primary account number: [REDACTED] 8769
Page 2 of 3

Virtual Wallet With Performance Select Account Summary

SARAH Y CHANG

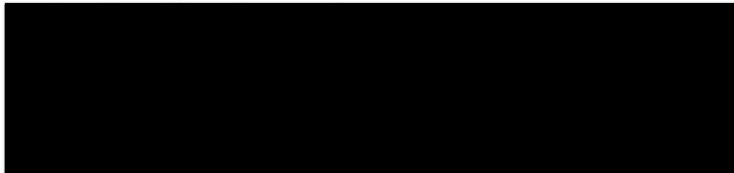
Account number: [REDACTED] 8769

Overdraft Protection Provided By: XXXXXX3901

Overdraft Coverage - Your account is currently Opted-Out.

You or your joint owner may revoke your opt-in or opt-out choice at any time.

To learn more about PNC Overdraft Solutions visit us online at pnc.com/overdraftsolutions.
Call 1-877-588-3605, visit any branch, or Sign on to PNC Online Banking, and select the "Overdraft
Solutions" link under the Account Services section to manage both your Overdraft Coverage and Overdraft
Protection settings.

Balance Summary**Interest Summary**

As of 05/16, a total of [REDACTED] in interest was paid this year.

**Activity Detail****Deposits and Other Additions**

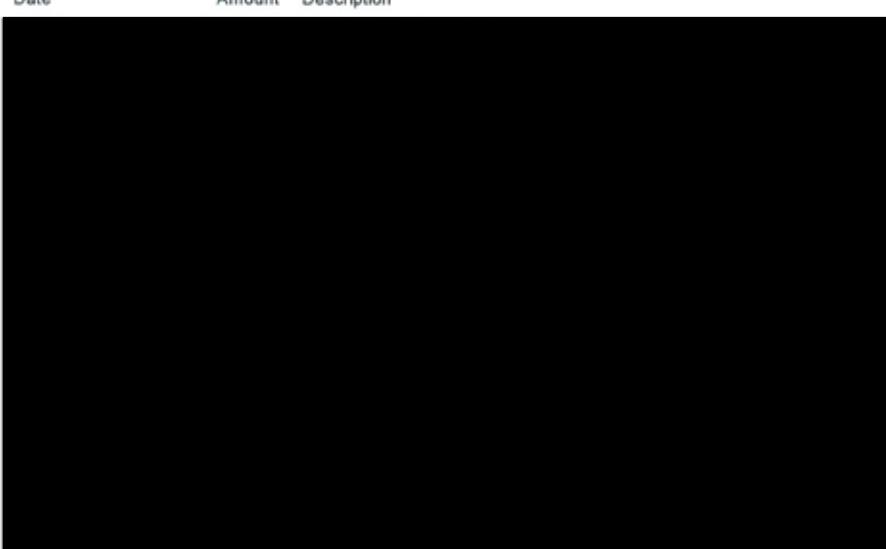
Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]
04/28	6,666.67	Book Trn Credit 234Sf2447Hn23Hyy

There were 3 Deposits and Other Additions totaling [REDACTED]

Online and Electronic Banking Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 10 Online or Electronic Banking Deductions totaling [REDACTED]



Virtual Wallet With Performance Select Statement

RECEIVED NYSCEF: 06/09/2025

For 24-hour information, sign on to PNC Bank Online Banking
on pnc.com.

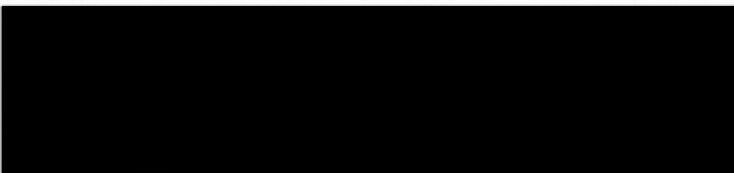
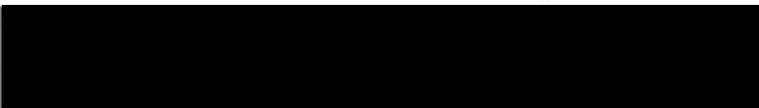
Account number: [REDACTED] 8769 - continued

For the period 05/17/2023 to 06/16/2023

SARAH Y CHANG

Primary account number: [REDACTED] 8769

Page 4 of 5

Balance Summary**Interest Summary**

As of 06/16, a total of [REDACTED] in interest was paid this year.

Activity Detail**Deposits and Other Additions**

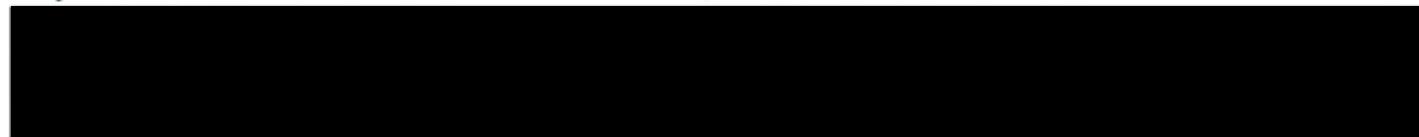
Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]
05/30	6,666.67	Book Trn Credit 235Ug5202Ouv68Cv
[REDACTED]	[REDACTED]	[REDACTED]

There were 5 Deposits and Other Additions totaling [REDACTED]

Online and Electronic Banking Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

There were 9 Online or Electronic Banking Deductions totaling [REDACTED]

Daily Balance Detail

NYSCEF DOC. NO. 6

RECEIVED NYSCEF: 06/09/2025

Virtual Wallet With Performance Select Statement

For 24-hour information, sign on to PNC Bank Online Banking on pnc.com.

Account number: [REDACTED] 8769 - continued

For the period 06/17/2023 to 07/18/2023

SARAH Y CHANG

Primary account number: [REDACTED] 8769

Page 2 of 2

Deposits and Other Additions - continued

Date	Amount	Description
06/29	6,666.67	Book Trn Credit 236Tg43573B74Xap

Online and Electronic Banking Deductions

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

There were 10 Online or Electronic Banking Deductions totaling [REDACTED].

Daily Balance Detail

Date	Amount	Description
[REDACTED]	[REDACTED]	[REDACTED]

Date	Amount	Description	Balance
06/29/23	6,666.67	Book Trn Credit 236Tg43573B74Xap	\$6,666.67
06/29/23	6,666.67	Book Trn Credit 236Tg43573B74Xap	\$6,666.67

Date	Amount	Description	Balance
06/29/23	6,666.67	Book Trn Credit 236Tg43573B74Xap	\$6,666.67
06/29/23	6,666.67	Book Trn Credit 236Tg43573B74Xap	\$6,666.67

NYSCEF DOC. NO. 6

RECEIVED NYSCEF: 06/09/2025

Virtual Wallet With Performance Select Statement

PNC Bank

For the period 07/19/2023 to 08/16/2023

SARAH Y CHANG

Primary account number: [REDACTED] 8769

Page 1 of 2

Number of enclosures: 0

For 24-hour banking, and transaction or interest rate information, sign on to PNC Bank Online Banking at pnc.com.

For customer service call 1-888-PNC-BANK
PNC accepts Telecommunications Relay Service (TRS) calls.

Para servicio en espanol, 1-866-HOLA-PNC

Moving? Please contact us at 1-888-PNC-BANK

Write to: Customer Service
PO Box 609
Pittsburgh PA 15230-9738

Visit us at PNC.com

Virtual Wallet With Performance Select Account Summary

SARAH Y CHANG

Account number: [REDACTED] 8769

Overdraft Protection Provided By: XXXXXX3901

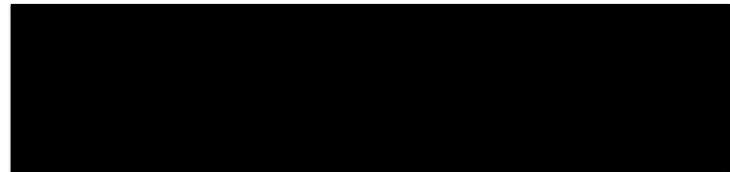
Overdraft Coverage - Your account is currently Opted-Out.

You or your joint owner may revoke your opt-in or opt-out choice at any time.

To learn more about PNC Overdraft Solutions visit us online at pnc.com/overdraftsolutions.

Call 1-877-588-3605, visit any branch, or Sign on to PNC Online Banking , and select the "Overdraft Solutions" link under the Account Services section to manage both your Overdraft Coverage and Overdraft Protection settings.

Balance Summary



Interest Summary

As of 08/16, a total of [REDACTED] in interest was paid this year.

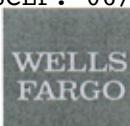
Activity Detail

Deposits and Other Additions

There were 6 Deposits and Other Additions totaling [REDACTED]

08/01 6,666.67 Book Trn Credit 2381B4858Mqq45Zh

August 31, 2023 ■ Page 2 of 4



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
8/30	WT Seq127720 Michael Chang /Org= Srf# 0067883242386205 Trn#230830127720 Rfb#		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 07/01/2023 - 07/31/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee Have any ONE of the following account requirements	Minimum required	This fee period
· Minimum daily balance		
	\$3,500.00	<input checked="" type="checkbox"/>
Fee period 08/01/2023 - 08/31/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee Have any ONE of the following each fee period	Minimum required	This fee period
· Minimum daily balance		
	\$3,500.00	<input checked="" type="checkbox"/>
ME/ME		



IMPORTANT ACCOUNT INFORMATION

NEW YORK CITY CUSTOMERS ONLY -- Pursuant to New York City regulations, we request that you contact us at 1-800-TO WELLS (1-800-869-3557) to share your language preference.

Other Wells Fargo Benefits

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

September 30, 2023 ■ Page 2 of 4

**Transaction history**

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
9/28	WT Seq132082 Michael Chang /Org= Srf# 0067883271894066 Trn#230928132082 Rfb#		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 09/01/2023 - 09/30/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period	\$3,500.00	<input checked="" type="checkbox"/>
Minimum daily balance The Monthly service fee summary fee period ending date shown above includes a Saturday, Sunday, or holiday which are non-business days. Transactions occurring after the last business day of the month will be included in your next fee period. M/E/M		

**IMPORTANT ACCOUNT INFORMATION****Limits to your Card**

Effective on or after August 28, 2023 in Selected Terms and Conditions for

- Wells Fargo Consumer debit and ATM cards
- Wells Fargo Campus debit and ATM cards
- Wells Fargo Business debit, ATM, and deposit cards
- Wells Fargo Advisors debit cards

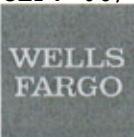
In the section titled "Using your card," under subsection titled "Daily limits and funds available for using your Card" bullet titled "The limits for your Card" is deleted and replaced with:

The limits for your Card: We provide you your daily ATM withdrawal and purchase limits when you receive your Card. You can confirm your Card's daily limits by signing on to Wells Fargo Online or the Wells Fargo Mobile® app, or calling us at the number listed in the

NYSCEF DOC. NO. 6

RECEIVED NYSCEF: 06/09/2025

October 31, 2023 ■ Page 2 of 4



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
10/30	WT Seq111138 Michael Chang /Org= Srf# 0067883303891128 Trn#231030111138 Rfb#		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 10/01/2023 - 10/31/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
· Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
ME/ME		



IMPORTANT ACCOUNT INFORMATION

Limits to your Card

Effective on or after August 28, 2023 in Selected Terms and Conditions for

- Wells Fargo Consumer debit and ATM cards
- Wells Fargo Campus debit and ATM cards
- Wells Fargo Business debit, ATM, and deposit cards
- Wells Fargo Advisors debit cards

In the section titled "Using your card," under subsection titled "Daily limits and funds available for using your Card" bullet titled "The limits for your Card" is deleted and replaced with:

The limits for your Card: We provide you your daily ATM withdrawal and purchase limits when you receive your Card. You can confirm your Card's daily limits by signing on to Wells Fargo Online or the Wells Fargo Mobile® app, or calling us at the number listed in the "Contact Us" section. Note: For security reasons there may be additional limits on the amount, number, or type of transactions you can make using your Card, including the geographic location of the ATM or merchant.

NYSCEF DOC. NO. 6

RECEIVED NYSCEF: 06/09/2025

December 31, 2023 ■ Page 2 of 4

WELLS
FARGO**Interest summary**

Interest paid this statement

Average collected balance

Annual percentage yield earned

Interest earned this statement period

Interest paid this year

**Transaction history**

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
11/30	WT Seq#93410 Michael Chang /Org= Srf# Ow00003888931523 Trn#231130093410 Rfb# Ow00003888931523		6,666.67	
12/29	WT Seq#32434 Michael Chang /Org= Srf# Ow00003991811727 Trn#231229032434 Rfb# Ow00003991811727		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 11/01/2023 - 11/30/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
· Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
Fee period 12/01/2023 - 12/31/2023	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
· Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>

The Monthly service fee summary fee period ending date shown above includes a Saturday, Sunday, or holiday which are non-business days. Transactions occurring after the last business day of the month will be included in your next fee period.
ME/ME

January 31, 2024 ■ Page 2 of 3



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
1/31	WT Seq#55774 Michael Chang /Org= Srf# Ow00004102454150 Trn#240131055774 Rfb# Ow00004102454150		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 01/01/2024 - 01/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
· Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
ME/ME		



IMPORTANT ACCOUNT INFORMATION

NEW YORK CITY CUSTOMERS ONLY -- Pursuant to New York City regulations, we request that you contact us at 1-800-TO WELLS (1-800-869-3557) to share your language preference.

Other Wells Fargo Benefits

Help take control of your finances with a Wells Fargo personal loan.

Whether it's managing debt, making a large purchase, improving your home, or paying for unexpected expenses, a personal loan may be able to help. See personalized rates and payments in minutes with no impact to your credit score.

Get started at wellsfargo.com/personalloan.

February 29, 2024 ■ Page 2 of 3



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
2/29	WT Seq#52176 Michael Chang /Org= Srf# Ow00004207629532 Trm#240229052176 Rfb# Ow00004207629532			6,666.67

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 02/01/2024 - 02/29/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
· Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
ME/ME		



IMPORTANT ACCOUNT INFORMATION

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Get started at wellsfargo.com/personalloan.



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
3/28	WT Seq#87333 Michael Chang /Org= Srf# Ow00004303499460 Trn#240328087333 Rfb# Ow00004303499460		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 03/01/2024 - 03/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	[REDACTED]
The Monthly service fee summary fee period ending date shown above includes a Saturday, Sunday, or holiday which are non-business days. Transactions occurring after the last business day of the month will be included in your next fee period. M/E/M		

IMPORTANT ACCOUNT INFORMATION

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Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
4/30	WT Seq#64755 Michael Chang /Org= Srf# Ow00004422371808 Trn#240430064755 Rfb# Ow00004422371808		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

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Fee period 04/01/2024 - 04/30/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
ME/ME		

IMPORTANT ACCOUNT INFORMATION

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Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
5/31	WT Seq#60805 Michael Chang /Org= Srf# Ow00004542698339 Trn#240531060805 Rfb# Ow00004542698339		6,666.67	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 05/01/2024 - 05/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
ME/MF		

IMPORTANT ACCOUNT INFORMATION

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Help take control of your finances with a Wells Fargo personal loan. Whether it's managing debt, making a large purchase, improving your home, or paying for unexpected expenses, a personal loan may be able to help. See personalized rates and payments in minutes with no impact to your credit score. Get started at wellsfargo.com/personalloan.

Other Wells Fargo Benefits



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
6/28	WT Seq#74498 Michael Chang /Org= Srf# Ow00004651649102 Trn#240628074498 Rfb# Ow00004651649102			6,666.67

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 06/01/2024 - 06/30/2024	Standard monthly service fee \$12.00	You paid \$0.00
<hr/>		
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee Have any ONE of the following each fee period	Minimum required	This fee period
• Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
<hr/>		
The Monthly service fee summary fee period ending date shown above includes a Saturday, Sunday, or holiday which are non-business days. Transactions occurring after the last business day of the month will be included in your next fee period. <small>ME/ME</small>		

IMPORTANT ACCOUNT INFORMATION

Effective September 1, 2024, we are making changes to certain ATM and debit card fees.

- We will no longer charge a fee for a balance inquiry at non-Wells Fargo ATMs. This \$2.50 fee is going away.
- We will no longer charge a fee for a funds transfer at non-Wells Fargo ATMs. This \$2.50 fee is also going away.



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
7/31	WT Seq#39673 Michael Chang /Org= Srf# Ow00004771702152 Trn#240731039673 Rfb# Ow00004771702152			6,666.67

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 07/01/2024 - 07/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	[REDACTED] <input checked="" type="checkbox"/>
ME/ME		

IMPORTANT ACCOUNT INFORMATION

Effective September 1, 2024, we are making changes to certain ATM and debit card fees.

- We will no longer charge a fee for a balance inquiry at non-Wells Fargo ATMs. This \$2.50 fee is going away.
- We will no longer charge a fee for a funds transfer at non-Wells Fargo ATMs. This \$2.50 fee is also going away.
- The fee for a cash withdrawal transaction at non-Wells Fargo ATMs in the U.S. will increase from \$2.50 to \$3.00. U.S. includes the 50 states and the District of Columbia, as well as the U.S. territories of American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Minor Outlying Islands, and U.S. Virgin Islands.

We base your account fees on the type of account you have and the services you use, so these fees may not be applicable to all customers. Other applicable fees for use of your card, and details about certain fee waivers and reimbursements, are described in the Wells Fargo Fee and Information Schedule applicable to your account.



Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
8/30	WT Seq#32503 Michael Chang /Org= Srf# Ow00004870100489 Trn#240830032503 Rfb# Ow00004870100489			6,666.67

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 08/01/2024 - 08/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	<input checked="" type="checkbox"/>
The Monthly service fee summary fee period ending date shown above includes a Saturday, Sunday, or holiday which are non-business days. Transactions occurring after the last business day of the month will be included in your next fee period. <small>ME/M</small>		

IMPORTANT ACCOUNT INFORMATION

NEW YORK CITY CUSTOMERS ONLY -- Pursuant to New York City regulations, we request that you contact us at 1-800-TO WELLS (1-800-869-3557) to share your language preference.

This notice re-establishes that Wells Fargo has the right to conduct setoff for overdrawn deposit account balances, where applicable, and in accordance with your governing Deposit Account Agreement. When we exercise this right, we may reduce funds in any account you hold with us for purposes of paying the amount of the debt, either due or past due, that is owed to us as allowed by the laws governing your account. Our right of setoff won't apply if it would invalidate the tax-deferred status of any tax-deferred retirement account (e.g., a SEP or an IRA) you keep with us. To review a copy of your Deposit Account Agreement, including the provisions related to the right of setoff, please visit wellsfargo.com/online-banking/consumer-account-fees/ or wellsfargo.com/biz/fee-information/.



Interest summary

Interest paid this statement
 Average collected balance
 Annual percentage yield earned
 Interest earned this statement period
 Interest paid this year



The Special Interest Rate on your account expires on 02/06/2025 and at that time, your interest rate will change to the account's current standard interest rate or Relationship Interest Rate if applicable. For current interest rates on your account, please contact your local banker or call the number listed on your statement.

Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
9/30	WT Seq#67738 Michael Chang /Org= Srf# Ow00004971408544 Trn#240930067738 Rfb# Ow00004971408544	6,666.67		

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 09/01/2024 - 09/30/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		
How to avoid the monthly service fee	Minimum required	This fee period
Have any ONE of the following each fee period		
• Minimum daily balance	\$3,500.00	
ME/ME		



IMPORTANT ACCOUNT INFORMATION

NEW YORK CITY CUSTOMERS ONLY -- Pursuant to New York City regulations, we request that you contact us at 1-800-TO WELLS (1-800-869-3557) to share your language preference.

CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK. See below.

NYSCEF DOC. NO. 6

December 31, 2024 ■ Page 2 of 5

RECEIVED NYSCEF: 06/09/2025

**Statement period activity summary**

Beginning balance on 10/1

Deposits/Additions

Withdrawals/Subtractions

Ending balance on 12/31

Account number: [REDACTED] 8074

SARAH YOUNG JOO CHANG

Pennsylvania account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): [REDACTED] 0503

Interest summary

Interest paid this statement

Average collected balance

Annual percentage yield earned

Interest earned this statement period

Interest paid this year

The Special Interest Rate on your account expires on 02/06/2025 and at that time, your interest rate will change to the account's current standard interest rate or Relationship Interest Rate if applicable. For current interest rates on your account, please contact your local banker or call the number listed on your statement.

Transaction history

Date	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
10/31	WT Seq#65233 Michael Chang /Org= Srf# Ow00005067751914 Trn#241031065233 Rfb# Ow00005067751914	6,666.67		
11/29	WT Seq#51569 Michael Chang /Org= Srf# Ow00005155874389 Trn#241129051569 Rfb# Ow00005155874389	6,666.67		

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the disclosures applicable to your account or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 10/01/2024 - 10/31/2024	Standard monthly service fee \$12.00	You paid \$0.00
The fee is waived this fee period because the account is linked to your Prime Checking, Premier Checking, or Private Bank Interest Checking account.		



REQUEST FOR JUDICIAL INTERVENTION

Supreme COURT, COUNTY OF New York

UCS-840
(rev. 12/16/2024)

Index No: _____

Date Index Issued: _____

For Court Use Only:

IAS Entry Date

Judge Assigned

Plaintiff(s)/Petitioner(s)

RJI Filed Date

Defendant(s)/Respondent(s)

CAPTION Enter the complete case caption. Do not use et al or et ano. If more space is needed, attach a caption rider sheet.

Sarah Chang

-against-

Michael Chang

NATURE OF ACTION OR PROCEEDING: Check only one box and specify where indicated.

COMMERCIAL

- Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.)
- Contract
- Insurance (where insurance company is a party, except arbitration)
- UCC (includes sales and negotiable instruments)
- Other Commercial (specify): _____

NOTE: For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d), complete and attach the **COMMERCIAL DIVISION RJI ADDENDUM (UCS-840C)**.

TORTS

- Asbestos
- Environmental (specify): _____
- Medical, Dental or Podiatric Malpractice
- Motor Vehicle
- Products Liability (specify): _____
- Other Negligence (specify): _____
- Other Professional Malpractice (specify): _____
- Other Tort (specify): _____

SPECIAL PROCEEDINGS

- Child-Parent Security Act (specify): Assisted Reproduction Surrogacy Agreement
- CPLR Article 75 - Arbitration [see **NOTE** in COMMERCIAL section]
- CPLR Article 78 - Proceeding against a Body or Officer
- Election Law
- Extreme Risk Protection Order
- MHL Article 9.60 - Kendra's Law
- MHL Article 10 - Sex Offender Confinement (specify): Initial Review
- MHL Article 81 (Guardianship)
- Other Mental Hygiene (specify): _____
- Other Special Proceeding (specify): _____

MATRIMONIAL

- Contested

NOTE: If there are children under the age of 18, complete and attach the **MATRIMONIAL RJI Addendum (UCS-840M)**.

For Uncontested Matrimonial actions, use the **Uncontested Divorce RJI (UD-13)**.

REAL PROPERTY Specify how many properties the application includes: _____

- Condemnation
- Mortgage Foreclosure (specify): Residential Commercial

Property Address: _____

NOTE: For Mortgage Foreclosure actions involving a one to four-family, owner-occupied residential property or owner-occupied condominium, complete and attach the **FORECLOSURE RJI ADDENDUM (UCS-840F)**.

- Partition

NOTE: Complete and attach the **PARTITION RJI ADDENDUM (UCS-840P)**.

- Tax Certiorari (specify): Section: _____ Block: _____ Lot: _____
- Tax Foreclosure
- Other Real Property (specify): _____

OTHER MATTERS

- Certificate of Incorporation/Dissolution [see **NOTE** in COMMERCIAL section]
- Emergency Medical Treatment
- Habeas Corpus
- Local Court Appeal
- Mechanic's Lien
- Name Change/Sex Designation Change
- Pistol Permit Revocation Hearing
- Sale or Finance of Religious/Not-for-Profit Property
- Other (specify): _____

STATUS OF ACTION OR PROCEEDING Answer YES or NO for every question and enter additional information where indicated.

YES NO

Has a summons and complaint or summons with notice been filed?

If yes, date filed: 06/09/2025

Has a summons and complaint or summons with notice been served?

If yes, date served: _____

Is this action/proceeding being filed post-judgment?

If yes, judgment date: _____

NATURE OF JUDICIAL INTERVENTION Check one box only and enter additional information where indicated.

- Infant's Compromise
- Extreme Risk Protection Order Application
- Note of Issue/Certificate of Readiness
- Notice of Medical, Dental or Podiatric Malpractice
- Notice of Motion
- Notice of Petition
- Order to Show Cause
- Other Ex Parte Application
- Partition Settlement Conference
- Request for Preliminary Conference
- Residential Mortgage Foreclosure Settlement Conference
- Waiver of Court Costs, Fees and Expenses
- Writ of Habeas Corpus
- Other (specify): _____

Date Issue Joined: _____

Relief Requested: SUMMARY JUDGMENT(BEFORE JOIND) _____

Return Date: 07/09/2025

Relief Requested: _____

Return Date: _____

Relief Requested: _____

Return Date: _____

Relief Requested: _____

Return Date: _____

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been

RELATED CASES List any related actions. For Matrimonial cases, list any related criminal or Family Court cases. If none, leave blank. If additional space is required, complete and attach the RJI Addendum (UCS-840A) .				
Case Title	Index/Case Number	Court	Judge (if assigned)	Relationship to instant case
PARTIES For parties without an attorney, check the "Un-Rep" box and enter the party's address, phone number and email in the space provided. If additional space is required, complete and attach the RJI Addendum (UCS-840A) .				
Un-Rep	Parties	Attorneys and Unrepresented Litigants	Issue Joined	Insurance Carriers
	List parties in same order as listed in the caption and indicate roles (e.g., plaintiff, defendant, 3 rd party plaintiff, etc.)	For represented parties, provide attorney's name, firm name, address, phone and email. For unrepresented parties, provide party's address, phone and email.	For each defendant, indicate if issue has been joined.	For each defendant, indicate insurance carrier, if applicable.
<input type="checkbox"/>	Name: Chang, Sarah Role(s): Plaintiff/Petitioner	ANDREW LANKLER, BAKER BOTTS, LLP, 30 ROCKEFELLER PLZ , NEW YORK, NY 10112, andrew.lankler@bakerbotts.com	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Chang, Michael Role(s): Defendant/Respondent	Issac Parker, Law Offices of Isaac Park LLC, 5 Minetta St. #4C, New York, NY 10012, 901-831-7177, isaac@parklaw.com	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	

I AFFIRM UNDER THE PENALTY OF PERJURY THAT, UPON INFORMATION AND BELIEF, THERE ARE NO OTHER RELATED ACTIONS OR PROCEEDINGS, EXCEPT AS NOTED ABOVE, NOR HAS A REQUEST FOR JUDICIAL INTERVENTION BEEN PREVIOUSLY FILED IN THIS ACTION OR PROCEEDING.

Dated: 06/09/2025

ANDREW MCCUTCHEON LANKLER

Signature

2547461

ANDREW MCCUTCHEON LANKLER

Attorney Registration Number

Print Name